

CCC:JAM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

RICHARD A. SCHAAF, JR.,

Defendant.

- - - - -X

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ APR 06 2018 ★
LONG ISLAND OFFICE

UNDER SEAL

COMPLAINT AND
AFFIDAVIT IN
SUPPORT OF
APPLICATION FOR
AN ARREST
WARRANT

(18 U.S.C. § 1703)

EASTERN DISTRICT OF NEW YORK, SS:

MJ 18- 300

Eric Sheen, being duly sworn, deposes and states that she is a Special Agent with the United States Postal Service, Office of Inspector General, duly appointed according to law and acting as such.

On or about and between March 2017 and April 3, 2018, within the Eastern District of New York and elsewhere, the defendant RICHARD A. SCHAAF, JR., being a Postal Service employee, did knowingly and unlawfully secrete, destroy, detain and delay letters, mail, articles and things contained therein entrusted to him which were intended to be conveyed by mail.

(Title 18, United States Code, Section 1703)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Postal Service, Office of Inspector General (“USPS OIG”). I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. The defendant RICHARD A. SCHAAF, JR. is an employee of the United States Postal Service. From approximately April 2016 to the present, he has been assigned to the Bethpage Station post office in Bethpage, New York.

3. In or about April 2018, the USPS OIG received information in reference to undelivered mail located in numerous black plastic trash bags on the property of a residence in Bellmore, New York (the “Bellmore residence”). Further investigation revealed that the defendant Postal RICHARD A. SCHAAF lives at the Bellmore residence.

4. Based on my training and experience, it is outside a Postal employee’s scope of employment to remove and retain large volumes of mail from their geographic area of employment or to secrete this mail at their residence.

5. On or about April 3, 2018, USPS OIG agents obtained consent to search the Bellmore residence by another resident of the property, who is also the owner of the Bellmore residence. Numerous black plastic garbage bags containing over approximately 1000 pieces of undelivered mail were found and seized from various locations in and around the Bellmore residence. Many of the pieces of mail dated back as far as March 2017 and were intended to be delivered to residents and businesses in Nassau County, including the Bethpage area that the defendant RICHARD A. SCHAAF was responsible for.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant RICHARD A. SCHAAF, JR., may be dealt with according to law.

IT IS FURTHER REQUESTED that all papers submitted in support of this application, including this complaint and affidavit, be sealed until further order of the Court. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving the target an opportunity to flee from prosecution.



Eric Sheen
Special Agent, United States Postal Service, Office
of Inspector General

Sworn to before me this
6th day of April, 2018



THE HONORABLE GARY R. BROWN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK